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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/5/2024

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## MEMO ENDORSED

March 4, 2024

BY ECF

Hon. Barbara Moses

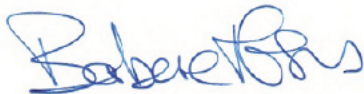
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The unopposed motions to stay discovery (Dkt. 60) and adjourn the initial conference (Dkt. 64) are GRANTED. Discovery is hereby STAYED pending decision on the motion to dismiss. The initial conference, now scheduled for March 7, 2024, is hereby ADJOURNED sine die. Within one week of the decision on the motion to dismiss, the parties shall file a joint status letter proposing at least two dates for the rescheduled initial conference.

The Clerk of Court is respectfully directed to close the motions at Dkts. 60 and 64. **SO ORDERED.**



Barbara Moses

United States Magistrate Judge

March 5, 2024

Re: ***Keep On Kicking Music, Inc., et al. v. Universal Music Group, Inc., et al.***,  
**1:23-cv-04400-JPO-BCM**

Dear Judge Moses:

This firm represents defendants and counterclaim-crossclaim plaintiffs UMG Recordings, Inc. (incorrectly sued as “Capitol Records, LLC” and “Motown Records”), Universal Music Corp. (incorrectly sued as “Universal Music Publishing Group”), Universal Music Group, Inc., and Quality Control Music, LLC (incorrectly sued as “Quality Control Music”) (together the “Universal Defendants”). We write with the consent of Plaintiffs, and Defendants Melodie Makers, Inc. (“Melodie”) and Kreyol Music, Inc. (“Kreyol”) concerning the Initial Scheduling Conference currently scheduled for March 7 at 11:00 a.m.

On February 28, 2024, Melodie and Kreyol moved to stay discovery pending resolution of their motion to dismiss. Dkt. 60. On February 29, 2024, the Universal Defendants provided notice that they do not oppose the motion to stay discovery. Dkt. 62 at 7. By letter dated March 4, 2024, Plaintiffs advised the Court that they also do not oppose the motion to stay discovery. Dkt. 63. Given that Kreyol’s and Melodie’s motion is now unopposed, the parties respectfully request that, if the Court grants the motion to stay, the initial scheduling conference be adjourned *sine die*.<sup>1</sup> The parties believe that, if discovery is stayed, it would be most efficient to hold off entering a discovery schedule until after the stay is lifted. We thank the Court for its attention to this request.

Respectfully Submitted,

/s/ Adam I. Rich

Adam I. Rich

cc: All counsel of record (via ECF)

<sup>1</sup> The parties are aware that Section 2(a) of the Court’s Individual Practices requires that requests to adjourn conferences be filed four days before the conference, but that was not possible here since it only became clear today that there was no opposition to the motion to stay discovery.

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